

ROBERT JAY HARRISON, MD, MPH - May 28, 2014

1 UNITED STATES DISTRICT COURT
 2 FOR THE DISTRICT OF SOUTH CAROLINA
 3 COLUMBIA DIVISION

4 SUSAN BOYKIN, INDIVIDUALLY AND)
 AS PERSONAL REPRESENTATIVE OF)
 5 THE ESTATE OF PHILIP BOYKIN,)

6 Plaintiff,)

7 vs.)

) Case No. 3:13-cv-00417MBS

8 SPECTRUM LUBRICANTS CORP.,) Volume I
 Acuity Specialty Products,)
 9 Inc., Zep, Inc., Acuity) Pages 1 - 158
 Specialty Products Group,)
 10 Inc., Safety Kleen Systems,)
 Inc., Bel-Ray Company, Inc.,)
 11 Wurth USA, Inc., Wurth/Service)
 Supply, Inc., Wurth Action)
 12 Bolt & Tool Co., Exxon Mobil)
 Corporation, John Does 1-100)
 13 (whose true names are unknown))
 and Idemitsu Lubricants)
 14 American Corporation,)

15 Defendants.)

16 DEPOSITION OF

17 ROBERT JAY HARRISON, MD, MPH

18 May 28, 2014

19
 20 Reported By: ALICE CHANG, RPR, CSR NO. 13654
 21 -----

22 JAN BROWN & ASSOCIATES

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1 question was different.

2 Do you agree with me that there remains a
3 debate among qualified, right-thinking scientists and
4 physicians on the question of whether benzene can cause
5 non-Hodgkin's lymphoma in humans?

6 MR. STEWART: Form objection.

7 THE WITNESS: I would agree there are other
8 experts who believe that question is uncertain. That's
9 all I would say. I would say that I don't agree with
10 those experts, and I think the interpretation of the
11 medical literature by others aside from myself, who are
12 excellent scientists, have concluded that it is probable
13 that benzene causes NHL.

14 MR. RIFF:

15 Q. What authoritative bodies can you point to
16 which agree with you?

17 **A. There are many authoritative bodies that**
18 **conclude that benzene is a carcinogen to the**
19 **blood-forming system that have reviewed the NHL**
20 **literature. Those bodies don't -- they don't comment on**
21 **causation.**

22 Q. Well --

23 **A. And they don't because that's not what they**
24 **are intended to do.**

25 Q. But what about --